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**FILED**

8/27/2013

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISIONED-6  
FILED FOR DOCKETING  
AUG 13 PM 4:53CLERK  
U.S. DISTRICT COURTAngela M. Brown on  
behalf of Shandra M. BrownHonorable Judge  
Gary Feinerman(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

vs.

Case No: 13CV2595  
(To be supplied by the Clerk of this Court)The Retirement Board  
of The Police Men's Annuity  
and Benefit Fund City  
of Chicago and Dr.  
Peter Orris(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")**FILED**AUG 13 2013 JH  
8/13/2013  
THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

## CHECK ONE ONLY:

AMENDED COMPLAINT First\_\_\_\_\_  
COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)\_\_\_\_\_  
COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)\_\_\_\_\_  
OTHER (cite statute, if known)**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

**I. Plaintiff(s):**

- A. Name: Angela Brown on behalf of Shandra M. Brown
- B. List all aliases: \_\_\_\_\_
- C. Prisoner identification number: \_\_\_\_\_
- D. Place of present confinement: \_\_\_\_\_
- E. Address: 12812 S. Loomis Calumet Park, IL 60827

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In **A** below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in **B** and **C**.)

- A. Defendant: The Retirement Board of The Policemen's Annuity and Benefit Fund  
City of Chicago  
Title: \_\_\_\_\_  
Place of Employment: \_\_\_\_\_
- B. Defendant: Dr. Peter Orris  
Title: \_\_\_\_\_  
Place of Employment: \_\_\_\_\_
- C. Defendant: \_\_\_\_\_  
Title: \_\_\_\_\_  
Place of Employment: \_\_\_\_\_

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: 13CV2595
- B. Approximate date of filing lawsuit: \_\_\_\_\_
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- D. List all defendants: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): \_\_\_\_\_
- F. Name of judge to whom case was assigned: \_\_\_\_\_  
\_\_\_\_\_
- G. Basic claim made: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- I. Approximate date of disposition: \_\_\_\_\_

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**

**IV. Statement of Claim:**

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

See Attached Form

Emotional harm:

Retirement Board Members who were The City Finance Department shut down Shandra court order in July 2007.

Mr. Jackson retired in October 2007. In July 2007, I start fighting the City for Shandra to be put back on City Insurance and for her to receive her support payments again.

I Angela Brown, mother of Shandra work for The City of Chicago, Department of Transportation Bureau of Bridges. We had been told that no one would be laid-off in my Bureau. I was the only employee laid-off December 31, 2008. Because of me fighting City Finance for her, Shandra felt that it is her fault I lost my City Job.

I took the City and Mr. Jackson to court we had three different court dates, 9/17/2007, 1/3/2008 and 3/10/2008. Mr. Jackson was present only for the 1/3 date. Shandra has to watch her father and City Attorney Jason Richard going in and out of Judge Savage Chamber's right in front of her. When Shandra seen how sick her father was she asked me not to bring him in court again. A third court date was set so I had to be present.

Honorable Judge Drella Savage for the second time denied Shandra support payments to come out of Mr. Jackson pension. She also denied Shandra to be place back on City insurance. At that third hearing Judge Savage acknowledges that Shandra is a person with a disability.

I respected Shandra request and did not pursue this again until after Mr. Jackson pass away. If the Retirement Board Member's had not stop Shandra court order, she would not have ever felt that she was causing her father to be sick by him coming to court.

After that 9/17 (first) court date we learn that Judge Savage is friend to the Brown Family. The Judge attended the same Church that Shandra aunt and her son attend. The Judge did not know that Shandra and I were a part of that family until after the first court date. When Shandra was told by her Grandmother and aunt that Judge Savage had a daughter and son in college, Shandra became very sick



and question why would Judge Savage hurt her by help them in stopping her benefit.

**Pain and Suffering:**

Shandra was told by The Retirement Board that her father pension went to his family. That left her confuse because she was legally recognize as Mr. Jackson legal daughter for whom he paid support payments as his dependent. Exclusionary action of The Retirement Board left Shandra emotionally distraught, with a since of abandonment.

**Loss of Income:**

Shandra lost 29 \$500.00 payments before Mr. Jackson pass away and 36 \$3,600.00 payments since his death. That amount is 60% of Mr. Jackson pension if he was received \$6,000.00 a month.

**Loss of Enjoyment of Life:**

Shandra became homeless and living in a shelter for women. She had to stop attending college. The Retirement Board left Shandra financially unable to pay education expense. She was unable to secure addition Federal grants.

**Punitive Damages:**

We are seeking punitive damages from the time The Retirement Board Member's stop the court order six years ago. To be determined by the court.

Sincerely:

*Angela Brown on behalf of Shandra M. Brown*

Angela Brown on behalf of Shandra M. Brown

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

**V. Relief:**

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

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VI. The plaintiff demands that the case be tried by a jury. ☐ YES ☐ NO

**CERTIFICATION**

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this August day of 13, 2013

Angela M. Brown on behalf of Shandra M. Brown  
(Signature of plaintiff or plaintiffs)

Angela M. Brown on behalf of Shandra M. Brown  
(Print name)

\_\_\_\_\_  
(I.D. Number)

\_\_\_\_\_  
12812 S. Loomis Calumet Park, IL 60827  
(Address)